

February 6, 2006

VIA ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: Certification of CPNI Filing
EB Docket Nos. 06-TC-060 and 06-36**

Dear Ms. Dortch:

Attached, on behalf of our client, Owner State Wireless, LLC (“OSW”), in accordance with the Federal Communications Commission’s Public Notice, DA 06-223, released January 30, 2006, and Section 64.2009(e) of the Commission’s Rules, is OSW’s customer proprietary network information (“CPNI”) compliance certificate and accompanying statement.^{1/}

If there are any questions regarding the attached compliance certificate and accompanying statement, please contact the undersigned directly.

Sincerely,

/s/ Russell H. Fox

Russell H. Fox

Attachments

cc: Byron McCoy (via email)
Best Copy and Printing (via email)

^{1/} This certification also is filed on behalf of Barry Devorzon dba Alaska Communications Inc., which is an entity affiliated with OSW.

CPNI Compliance Certification

I hereby certify, as an officer of Owner State Wireless, LLC ("OSW"), that I have personal knowledge that, to the extent required by the rules and regulations of the Federal Communications Commission, OSW has established operating procedures that are adequate to ensure compliance with the rules in Subpart U – Customer Proprietary Network Information – of Part 64 of Title 47 of the Code of Federal Regulations. Attached to this Compliance Certification is a statement explaining how OSW operating procedures ensure that it is in compliance with these rules.

Name: 
Mead Treadwell

Title: Manager

Date: February 6, 2006

STATEMENT

Pursuant to Section 64.2009 of the Federal Communications Commission's ("FCC's") rules and regulations, 47 C.F.R. § 64.2009, Owner State Wireless, LLC ("OSW") has prepared this statement outlining why its operating procedures ensure that it is in compliance with the FCC's Customer Proprietary Network Information ("CPNI") rules.

OSW does not disclose CPNI to any third parties or allow third party access to CPNI. Nor does OSW engage in outbound marketing that utilizes CPNI. OSW, however, trains its employees regarding the appropriate use of CPNI and will ensure that any employee that violates established CPNI procedures is appropriately disciplined. In addition, OSW will maintain a record of all instances in which CPNI was disclosed or provided to third parties or in which third parties were allowed access to CPNI;

If OSW decides to employ CPNI for outbound sales and marketing campaigns, it will:

- maintain a record of sales and marketing campaigns that used customers' CPNI;
- establish a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintain records of compliance for a minimum period of one year;
- and require sales personnel to obtain supervisory approval of any proposed outbound marketing request for customer approval regarding CPNI.